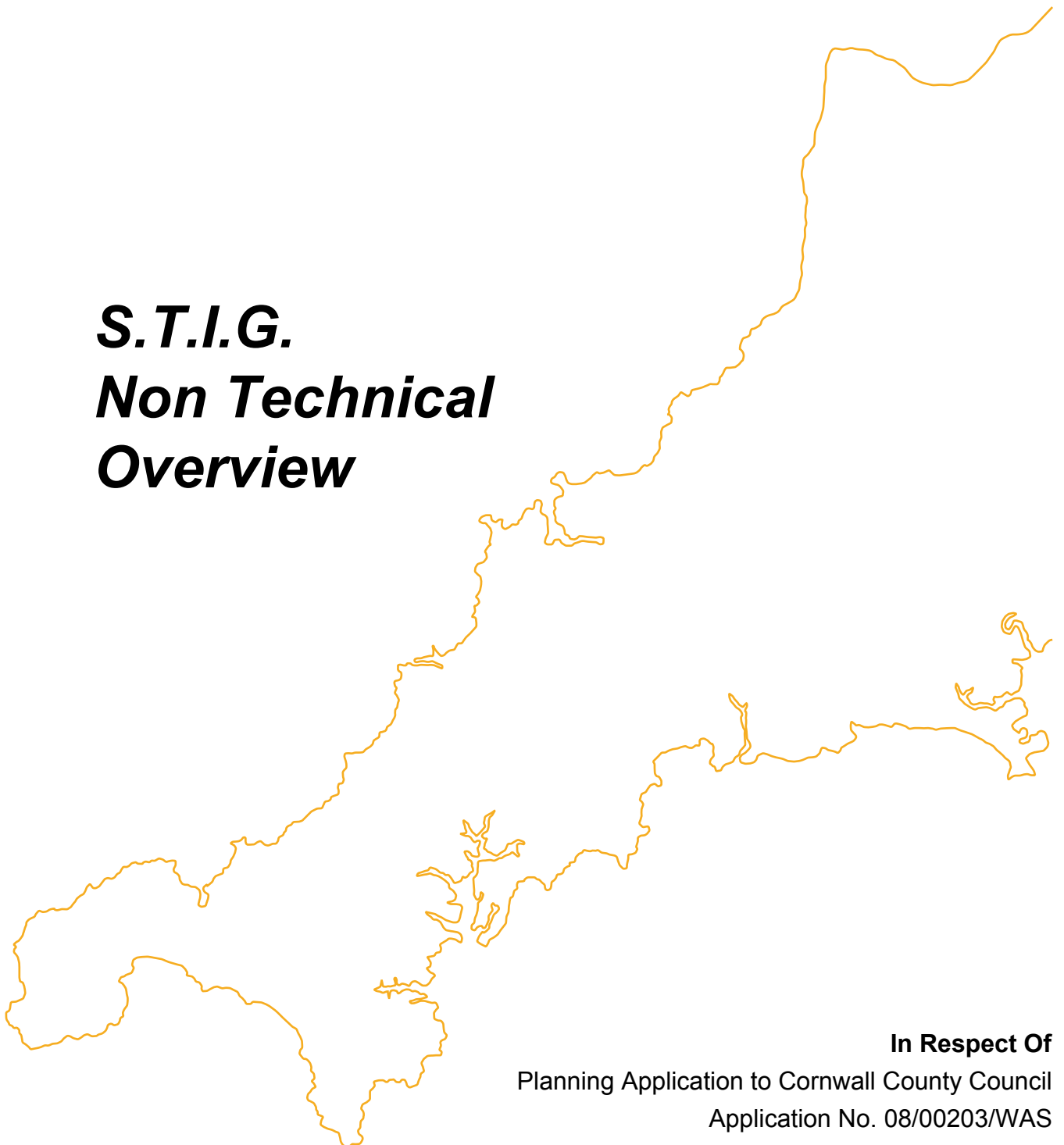




Consultee Response to SITA Additional Information

Consultee
St.Dennis Anti Incinerator Group (S.T.I.G.)

S.T.I.G. ***Non Technical*** ***Overview***



In Respect Of
Planning Application to Cornwall County Council
Application No. 08/00203/WAS

S.T.I.G. Non Technical Overview

Given the amount of new evidence issued for re-consultation, we have focused on a number of specific areas that are of importance to S.T.I.G.

Impact On Human Health

S.T.I.G. maintains that incineration is not an environmentally friendly technology for dealing with waste and is not the Best Available Technology.

There are now far more benign technologies available of a type that could be provided, discreetly, at strategic sites closer to the areas of greatest population.

This would ensure that waste miles were reduced and the burden fairly shared by all, rather than imposing it upon one single community, when this community is a minor contributor to the total waste tonnage of the County.

S.T.I.G. draws attention to the recent representations to the European Parliament concerning the Waste Framework Directive by Doctors' Associations (representing over 33,000 members).

They specifically requested the European Parliament not to accept the reclassification of 'efficient incineration' as recovery.

Their representations stated that:

*'more waste burnt means more man-made toxics in the ecosystems, more fine particles in the air and more bottom ash and fly ash in the ground. We regret that we are going to see the amount of waste being incinerated increasing in the next years which would put even more fellow Europeans under risk ... several recent studies of wide samples of population continues to reveal the threat that incinerators pose to human health in Europe and around the world. **Ultra-fine particles emissions are still not monitored anywhere in Europe, even though the danger these particles pose is well documented**'.*

SITA Response states: HIA is "*intrinsically highly technical*"

S.T.I.G. Maintains: The HIA is no different from any other computer modelled assessment and this statement is either an attempt to undermine the intellectual capacity of critics or a cover up for inadequacy.

The 'Human health risk conclusion' states '*.... that the CERC does not pose an unacceptable risk to human health*'

S.T.I.G. Maintains: "*acceptable*" or "*unacceptable risk*" is not a scientific term or measurement. Risks are expressed as 1:1,000 or 1:1,000,000.

S.T.I.G. Non Technical Overview

The use of "unacceptable" etc. is purely subjective, relating to who does or does not accept it. It is clear that even SITA agree that the incinerator does pose some degree of risk to health.

S.T.I.G. remains unconvinced by response 1, which states that the conclusion of the Human Health Risk Assessment is that 'CERC does not pose an unacceptable risk.'

S.T.I.G. questions what **actual** risks are posed in this 'acceptable risk'?

Section 2.0 General Comments - Sustainability

Request 2 - SITA Response

S.T.I.G. Maintains that:

- a. Significance is a scientific term and cannot be considered or not considered. Something is either significant or it isn't.
- b. Environmental, economic and social factors can and should be assessed scientifically to see if they have significance and should therefore be added to all other weightings.

Sustainability *was* a concept. It is now, increasingly, an economic choice, it is also a perception.

Unfortunately this term is increasingly used, disingenuously, to lend credibility and a 'green gloss' to projects.

Sadly it is often used as a synonym for affordable, often by those who know the *price* of everything but the *value* of nothing.

Section 3.0 Supporting Statement

Request 1.1 - SITA Response

S.T.I.G. Notes:

- The Applicant now concedes a reduced rate of growth for MSW
- EU directives require significant growth in recycling to meet the targets for 2010 and beyond. These targets are set to increase.

Request 1.3 - SITA Response

S.T.I.G. Maintains:

The Applicant is entitled to their view, however it is *only* their view.

It is in their interest to present a case that justifies their assertions and supports their proposal.

The Applicant fails to consider

S.T.I.G. Non Technical Overview

- Waste Minimisation Programmes
- Changing attitudes
- Introduction of Food Waste collections

Had BIO WASTE solutions, been prioritised previously, with Anaerobic Digestion provision, 43,000 tonnes of food waste, alone, could have been diverted from Landfill last year (*ref: CCC Press release Dec 2008*)

Request 1.4, 1.5 and 1.6 - SITA Response

S.T.I.G. Notes:

The Applicant has been obliged to correct misleading statements.

Request 1.6 - SITA Response

Traffic/ Number of Facilities

S.T.I.G. Notes:

The Applicant does not appear to answer the question, which implied that the EIA is flawed as it assumes that the use of a single centre solution would minimise traffic movements.

The answer merely says that this was not implied and that any problems are addressed by measures in the proposals without saying what they are or where they can be found.

Section 4.0 Design And Access Statement

Request 2.1 - SITA Response

Water

S.T.I.G. Maintains:

Despite all the material on how efficiently it will be harvested, the Applicant has yet to produce a figure to show how much rainwater will be used as process water or total rainwater to be used on site.

S.T.I.G. Notes:

Section 13.3 of the Regulation 19 request states that the incinerator will use 50,000m³ of water from the local mains supply each year.

Mr. Brian Blake, Area Manager for South West Water (see SWW document 4132087/190/CO/1129) has raised concerns about the main pipes in this area, which are known to burst on a regular basis and that heavier pumping could cause further problems.

S.T.I.G. Non Technical Overview

S.T.I.G. questions why it is necessary to use so much water from the mains. This water is, presumably of drinking water quality. This would seem to represent a huge drain on resources, increasing pressure on the pumping system, in an area already subject to problems.

Request 2.5 - SITA Response

S.T.I.G. Notes:

- a. The calorific value of the fuel will only rise to the level of 13 MJ/kg if high energy waste is burned.

This would usually consist of wood, plastic, or paper, in other words waste suitable for recycling.

Indeed, the Applicants Environmental Permit application states:

*The facility will produce electricity from the combustion of mixed residual municipal waste which will, in general, comprise solid materials with a minimal liquid content such as * **plastic, paper and cardboard textiles**; * **food waste**; * **wood**; * **glass**; * **inert substances and metals**.*

An admission that this Incinerator would rely on feedstock which **could & should** be recycled.

Yet the Applicant consistently states publicly that recyclables will not be burned.

- b. SITA advertising material suggests that the air pollution control system is already the most efficient system available. SITA now suggests that if necessary, due to *tighter regulation*, it would be possible to fit a more efficient system. If a more efficient system exists, why not fit it now?

Section 5.0 Assessment Of Alternative Sites

The Waste Local Plan was adopted in December 2002. This identified that a single Energy from Waste plant should be located within an Area of Search in Mid Cornwall.

NB. Not specifically an INCINERATOR but an Energy from Waste Plant.

EFW is not exclusive to Incineration.

However, Policy L6 of the Waste Local Plan states that the suitability of sites identified within this Area of Search should be assessed against eight criteria.

These included the ability of the plant to be served by **rail** and that it would not adversely affect the integrity of a Special Area of Conservation (SAC).

S.T.I.G. Maintains:

Rostowrack Farm is a singularly inappropriate site for such a proposal.

S.T.I.G. Non Technical Overview

Greenfield sites are a limited commodity in the heart of the China Clay Area so should be afforded special protection.

Users of public footpaths and residents of individual properties will suffer considerably from the changes the proposed haul road would cause to current viewpoints. **This haul road would be necessary due lack of rail access.**

The Incinerator and ancillary buildings would be positioned too close to a SAC, a SSSI and the settlements of both St Dennis and Treviscoe,

Clearly the belated and extreme increase in stack height to a massive 120m in order to disperse emissions away from fragile eco systems is just one example of a flawed site selection process undertaken with little knowledge or appreciation of local conditions and vulnerabilities.

The fact that the site is partially located in an Area of Special Environmental Concern as well as a 'Buffer Zone' should have automatically excluded it from any consideration for any development of this type, mass and scale.

S.T.I.G. Maintains:

Despite the specific requirement for Rail Access, in site selection criteria, **there is no intention for the site to be served by rail.**

Arguing that it has the *potential* to be served by rail is disingenuous.

The existing line is inadequate and considerable new infrastructure would be required to link proposed transfer stations by rail to the site.

Rail access has consistently been used to justify site selection and has been used merely to engineer the **appearance** of compliance with policy.

The Applicant makes clear that it is the County Council's responsibility to develop the necessary infrastructure needed elsewhere in the County to enable waste to be transported by rail. (SITA Response 4.0, 2.2)

It is apparent that no guarantees have been provided, proving this would ever be achievable.

S.T.I.G. Non Technical Overview

S.T.I.G. Notes:

Such an enterprise would involve considerable cost to the taxpayer and would place a heavy burden on the finances of the new Cornwall Council. There is considerable doubt that funds would ever be available in the near or distant future. Therefore the site does not qualify within the policies of the Waste Local Plan.

Mass And Scale

The mass and scale of the building and the 120m x 16m twin stacks would have a severe and detrimental impact on the setting of the area and cannot be screened or mitigated in any meaningful way.

The recent hoisting of a Balloon to indicate the height of the Stack, caused shock, horror and fear within the community.

It was made apparent there would be no escape.

It would tower over the village, dwarfing homes and humans everywhere, with its intimidating, all pervasive, dominating presence.

It would be a constant reminder of how little the local community has been considered or cared for.

Traffic And Stack Emissions

S.T.I.G. Maintains:

This plant could not operate without transport to and from the site.

Therefore all vehicle emissions should be included in an overall calculation for emissions emanating from this Plant.

Combined Traffic and Stack emissions should be evaluated to assess their impacts upon:

- a. Vegetation and soil, by deposition
- b. Humans through inhalation, absorption, diet
- c. Farm and wild animal's inhalation, absorption, diet
- d. The Food Chain
- e. Climate change

The proposed biogas plant at Fraddon must now also be factored in, to enable the cumulative impact of both sites to be assessed.

S.T.I.G. Non Technical Overview**Regulation 19 - SITA Response****General Comments And Queries****Page 6**

4.9 Have the lorry movements of diesel tankers been included?

Page 8

4.18 /4.39 Will ALL paths be of gravel? What type of crossing will be provided? This is a confusing paragraph and points could have been laid out better.

6.80 The footpath usage has been undervalued, by surveying at an inappropriate time. The re-routing of the footpaths and the crossing of a haul road will be a loss of amenity.

6.104 This section, coupled with the above comment, smacks of 'we want it here so we will put the path round it' How arrogant.

6.105 People, dogs, and children, will have to cross this junction.

The vehicle movements are approximately 1 per minute, not including traffic from employees, auxiliary services, visitors, maintenance vehicles, etc.

What road safety features will be in place, to facilitate ease of movement at this junction?

Page 9**Section 5**

Presumably the applicant wants to blind us with science.

5.2 Is a fee of £30.00 making the document readily available?

The pertinent paragraphs should, at least, be provided here.

Page 12

5.5 Camborne is flat and industrial, with completely different and localized weather conditions.

Page 24

6.3 How easy would it have been to ask the clay works for a 'ball park' figure. If there is no rail movement, does this make the reason for siting it here obsolete?

S.T.I.G. Non Technical Overview**Page 29**

7.13 What has happened in the past is not relevant. They have been asked a question now. Why not comply with a request for an estimation?

Page 32

10.2 The removal of ancient Cornish hedge is *removal*, even if the vegetation, soil and stone is re-used. Rebuilding the hedge somewhere else is building a hedge, using re-claimed materials.

10.93 CCC should be protecting the Cornish landscape, so important to the tourist industry.

Page 33

10.94 These Cornish hedges **are** important. The dismissive destruction would set a precedent in planning law.

This could mean the future loss of local Cornish landscape features.

14.49 Should this be allowed?

Page 43

10.5 The water system may be 'up to it' but is the pipe work? Local knowledge will substantiate the significant number of pipe work breakdowns in the area of the proposal.

10.6 Are these tanks of adequate size?

Page 45

14.52 It is admitted that the proposed development will be dominant, in the wider viewpoints of the Church.

This is an admission that it will therefore dominate the entire area of St Dennis.

14.54

The Stack would certainly be visually dominant from the A30, and from the air. These are the gateways to Cornwall for the visitors, the local economy relies upon.

S.T.I.G. Non Technical Overview

Section 3

Drawing number EFW-POR-26 shows the true enormity of the stack. This is totally unsuitable in a rural situation.

Environmental Issues

This proposal would contribute to Climate Change, by producing Green House Gas emissions through the:

- Process of incineration: burning fossil fuel derived products.
- Increased waste miles: vehicle fuel emissions.
- Tonnes of CO₂ released, per tonne of waste incinerated.
(*all transportation must be factored in*).
- The stated intention to use 300,000 litres of fuel oil per annum.
- Any assertion that CO₂ levels would be reduced, compared to current practice, is disingenuous. Current practice is no benchmark considering its record on GHG emissions to date.
- Greenhouse Gas Emissions from Landfill could be cut at a stroke, by the simple expediency of removing all biodegradable waste through segregated collections, at source. It's diversion to, for instance, EFW Anaerobic Digesters and Composting facilities would create a Virtuous Circle, rather than a Cycle of Destruction.
- An 80% reduction in GHG emissions by 2050, will not be facilitated by the continued proliferation of Mass Burn Incinerators throughout the UK.

A comprehensive ENERGY IN v ENERGY OUT audit should be mandatory for this or any similar proposal elsewhere:

It should encompass ALL inputs, including that used in the extraction and manufacture of raw materials, production of goods and transport, relating to first use, as well as the continual replacement necessitated by the wanton waste and destruction of incineration.

It should be obvious that this application should not be considered in isolation.

Any Incinerators, proposed elsewhere, will add to Climate Change in a similar manner. The accumulative effects, nationally and globally, must be taken into consideration.

If we are to meet the challenging targets for the reduction of CO₂ emissions, more benign methods of waste treatment must replace incineration.